

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., <u>et al.</u> , ¹)	Case No. 01-1139 (KG)
)	Jointly Administered
Debtors.)	
		Re: Docket Nos.: _____

**ORDER GRANTING MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE
REORGANIZED DEBTORS TO EXCEED THE PAGE LIMIT REQUIREMENT
FOR THE OMNIBUS MEMORANDUM IN SUPPORT OF GRANTING THE
REORGANIZED DEBTORS' SUMMARY JUDGMENT MOTION, DENYING
NORFOLK SOUTHERN'S CROSS-MOTION AND DISALLOWING
NORFOLK SOUTHERN'S INDEMNIFICATION CLAIM**

Upon consideration of the motion (the "Motion to Exceed") of the above-captioned reorganized debtors (collectively, the "Reorganized Debtors") for entry of an order (this "Order") authorizing the Reorganized Debtors to exceed the page limit requirement imposed by Local Rule 7007-2(a)(iv) for the Omnibus Memorandum in Support of Granting the Reorganized Debtors' Summary Judgment Motion, Denying Norfolk Southern's Cross-Motion and Disallowing Norfolk Southern's Indemnification Claim (the "Omnibus Memorandum"); and due and proper notice of the Motion to Exceed having been given; and it appearing that sufficient cause exists for granting the requested relief, it is hereby ORDERED that:

1. The Motion to Exceed is GRANTED.

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.").

2. The Reorganized Debtors are authorized to file the Omnibus Memorandum in excess of the page limitation prescribed by Local Rule 7007-2 and the General Chambers Procedures.

3. This Court shall retain jurisdiction with respect to any and all matters arising from or related to the interpretation of this Order

Dated: _____, 2017

The Honorable Kevin Gross
United States Bankruptcy Judge